



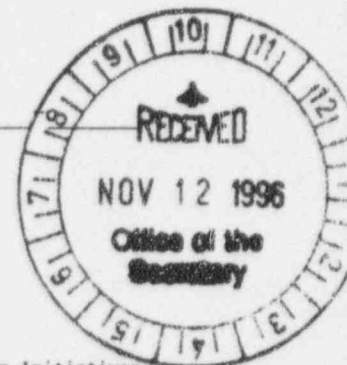
## NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

## DIRECTION SETTING ISSUE COMMENT FORM

NAME \_\_\_\_\_

PHONE NO. (\_\_\_\_) \_\_\_\_\_

AFFILIATION \_\_\_\_\_



## PLEASE CHECK ONLY ONE:

- ☐ DSI 2 - Oversight of the Department of Energy  
☐ DSI 4 - NRC's Relationship with Agreement States  
☐ DSI 5 - Low-Level Waste  
☐ DSI 6 - High-Level Waste  
☐ DSI 7 - Materials/Medical Oversight  
☐ DSI 9 - Decommissioning - Non Reactor Facilities  
☐ DSI 10 - Reactor Licensing for Future Applicants  
☐ DSI 11 - Operating Reactor Program Oversight  
☐ DSI 12 - Risk-Informed, Performance-Based Regulation

- ☒ DSI 13 - Role of Industry  
☐ DSI 14 - Public Communication Initiatives  
☐ DSI 20 - International Activities  
☐ DSI 21 - Fees  
☐ DSI 22 - Research  
☐ DSI 23 - Enhancing Regulatory Excellence  
☐ DSI 24 - Power Reactor Decommissioning  
☐ General

## COMMENT:

Under C.2. Evolving Regulatory Framework

You state that there is a growing use of PRAs in developing risk-informed, performance based regulations. However, NRC has not reviewed the IPE submittals to a significant enough extent to allow the IPEs/PRAs to be used in ~~the~~ ~~the~~ making licensing or regulatory decisions. It does not appear that NRC's PRA Implementation Plan deals with this problem. (1) Does NRC intend to invest the resources to review PRAs adequately so industry can really use them in licensing?

(2) Does NRC expect it will be requiring PRAs to be performed for all plants, kept up-to-date, and performed using criteria in some Standard Review Plan form?



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### COMMENT:

If Option 2 is chosen, there are two potential problems. Please discuss how they would be overcome:

A. Over the last 10 years, many utilities have demonstrated that if they are not carefully audited and inspected, they will cut corners and ~~take the~~ not work hard in areas where NRC has eased its oversight. Examples include plant licensing, bases, plant design bases, 50.59 evaluations, MOV inspection, and other areas. Since NRC Policy Statements ~~have no legal~~ do not create a legal requirement on licensees, why should the public expect Option 2 to work?

B. If <sup>direct</sup> NRC inspections and oversight are (over

diminished by choosing Option 2, it is probable that NRC (in particular NRR and Regional) resources will probably be further cut by Congress than is even expected today. How could NRC then turn around and reinstitute direct oversight if 4-5 years from now it turns out that industry is incapable of maintaining increased effective self regulation?